

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:21-cv-00669

IHFC PROPERTIES SPE, LLC

Plaintiff

v.

ELITE MFG. CORP.,
d/b/a ELITE MODERN

Defendant

**ASSENTED-TO MOTION TO
EXTEND TIME TO RESPOND
TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6 and Local Rule 6.1, Defendant, Elite Mfg. Corp., d/b/a Elite Modern, by counsel and with the assent of counsel for the Plaintiff, respectfully moves the Honorable Court to extend by approximately two weeks the time in which to answer or otherwise respond to the Plaintiff's Complaint, on the grounds that there is good cause for doing so. Accordingly, Defendant shows good cause for its Motion as follows:

1. Plaintiff commenced this Action on or about July 30, 2021, against Defendant in the Guilford Superior Court, General Court of Justice, State of North Carolina, File No. 21-CVS-870.
2. On August 16, 2021, Defendant obtained an Order from the Guilford Superior Court, General Court of Justice, State of North Carolina, granting an extension

of time for Defendant to file its answer or otherwise respond to Plaintiff's Complaint, up to and including October 1, 2021.

3. On September 9, 2021, this Court granted an Order extending the time to respond to October 1, 2021, mirroring the state court order.

4. Undersigned counsel requires another brief extension of time to confirm certain facts with the Defendant so that Defendant's Answer properly addresses the allegations in Plaintiff's Complaint.

5. Counsel for Plaintiff assents to the relief granted in this Motion.

WHEREFORE, Defendant respectfully requests this Honorable Court grant an Order consistent with the State Court Order and enlarge time for Defendant to answer or otherwise respond to Plaintiff's Complaint, through and including **October 14, 2021**.

Dated: October 1, 2021

Respectfully submitted,

/s/ Joe Dye Culik

Joe Dye Culik (N.C. Bar No. 50365)

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Attorney for Defendant Elite Mfg. Corp.

CERTIFICATE OF SERVICE

I hereby certify that that foregoing document was filed with the Clerk of Court using the CM/ECF system and that counsel for Plaintiff was served via electronic email, at the email address indicated below:

Andrew S. Lasine
Keziah Gates LLP
sam@keziahgates.com

Dated: October 1, 2021

/s/ Joe Dye Culik
Joe Dye Culik